

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS SUSAN W. NEEDHAM  
(OCA/USPS-T7-35-38)  
(August 6, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

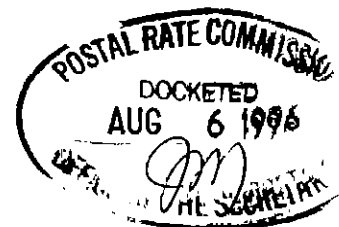
Respectfully submitted,

*Gail Willette*

GAIL WILLETTE  
Director  
Office of the Consumer Advocate

*Shelley Dreifuss*

SHELLEY DREIFUSS  
Attorney



OCA/USPS-T7-35. Please refer to page 25, lines 1-8 of your testimony where you state that "non-residents facing higher fees, would be more likely to give up their boxes, thus making them available for residents."

- a. Please confirm that proposed resident fees are less than the cost of providing box service. If you do not confirm, please explain how to interpret the figures of your Table I and Table 15 of USPS-T-4.
- b. If you confirm part "a," please confirm that the Postal Service will actually lose money for every box rented to a resident. If you do not confirm, please explain.
- c. Please confirm that the only proposed post office box fees that exceed the cost of providing the box service are for non-residents. If you do not confirm, please explain how to interpret the figures of your Table II and Table 15 of USPS-T-4.
- d. If you confirm part "b," please confirm that the postal service can only make money on boxes rented to non-residents. If you do not confirm, please explain.
- e. If the waiting list for boxes at a post office includes both residents and non-residents, please confirm that the postal service has an economic incentive to lease boxes first to the waiting non-residents.

- f. Please confirm that adding new box capacity is cost-effective at the proposed rates only when the new boxes can be rented to non-residents. If you do not confirm, please explain how renting new boxes below cost to residents is cost-effective.
- g. Please confirm that the proposed box fee structure creates an economic incentive for postmasters to prefer non-resident box holders and to accept resident applicants for boxes only when the available supply of non-residents is exhausted. If you do not confirm, please explain. If you confirm, please elaborate on your claim that these new fees will make more boxes available for residents.

OCA/USPS-T7-36. Refer to your response to interrogatory

OCA/USPS-T7-5(c).

- a. What were the amounts of the higher and lower fees that were rejected?
- b. What percentage of post office box customers terminate box service before their rental period has expired?

OCA/USPS-T7-37. Refer to your response to interrogatory

OCA/USPS-T7-14, where you state that the "decision whether or not to maintain a waiting list is made individually by each

postmaster." If postmasters do not maintain a waiting list, by what means do postmasters determine to whom boxes will be rented when the demand for boxes exceeds the number of boxes available for rent at a postal facility?

OCA/USPS-T7-38. Refer to your response to interrogatory OCA/USPS-T7-15(a), where you state that the Postal Service "is unable to identify all offices in which management has complained to supervisors regarding the problems caused by non-resident box holders." Other than the postal facilities discussed in the testimony of witnesses in this proceeding, please identify any postal facilities where there have been complaints concerning non-resident box holders. Please provide supporting details.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

*Shelley Dreifuss*  
SHELLEY DREIFUSS  
Attorney

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